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**Pro hac vice application forthcoming*

Attorneys for Defendant
MGM Resorts International

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHELLE RIGHETTI, individually and on
behalf of all others similarly situated,
Plaintiff,

v.

MGM RESORTS INTERNATIONAL,
Defendant.

Case No. 2:23-cv-02064-APG-DJA
**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Michelle Righetti and Defendant MGM Resorts International (“MGM”) (collectively, the “Parties”) respectfully stipulate that MGM’s time to respond to the Complaint be extended from the current deadline of March 1, 2024, to and including March 11, 2024. This is the first stipulation for an extension of time to file MGM’s responsive pleading.

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently thirteen other related actions filed against MGM pending in this District (the “Related Actions”). *See Owens v. MGM Resorts Int’l*, No. 2:23-cv-01480; *Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481; *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537; *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549; *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550; *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577; *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698; *Bezak v. MGM Resorts Int’l*, No. 2:23-cv-01719; *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981; *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777; *Manson v. MGM Resorts Int’l*, No. 2:23-cv-01826; *Mejia v. MGM Resorts Int’l, et al.*, No. 2:24-cv-00081; *Sloan v. Vici Properties, Inc.*, No. 2:23-cv-02042.

On December 6 and December 20, 2023, plaintiffs’ counsel in six consolidated putative class actions brought against MGM by individuals who allege their PII was compromised as a result of a cybersecurity incident involving MGM in 2019 (the “2019 Actions”) filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1, notifying the Court that the Related Actions are related to the 2019 Actions. *In re: MGM Resorts Int’l Data Breach Litig.*, No. 2:20-CV-00376-GMN-NJK, ECF 186, 188. Plaintiffs in this action will oppose this effort because the 2019 Actions involved a different threat actor and different data. No order has issued on the notices filed by the plaintiffs in the 2019 Actions, and MGM has not responded to any other Complaint in the Related Actions.

While the foregoing matters are pending resolution, and to best ensure efficient management of this and the other Related Actions, there is good cause to permit additional time for the various parties to the Related Actions to meet and confer prior to the response to the Complaint in this action being due.

1 The Parties' request is made in good faith to enable the parties to finalize these meet-
2 and-confers and to conserve judicial and party resources. Moreover, this case is in its
3 infancy, and this request will not prejudice any party.

4 **WHEREAS** the Parties respectfully request that MGM shall have until March 11,
5 2024, to answer, move, or otherwise respond to the Complaint.

6 Dated: February 27, 2024

Respectfully submitted,

7
8 /s/ Charles A. Jones

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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 MICHELLE RIGHETTI, individually and on
4 behalf of all others similarly situated,
Plaintiff,

5 v.

6 MGM RESORTS INTERNATIONAL,
7 Defendant.

Case No. 2:23-cv-02064-APG-DJA

~~PROPOSED~~ ORDER GRANTING
STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT

8
9 Upon consideration of the foregoing stipulation to extend Defendant MGM Resorts
10 International's time to file response to Plaintiff's Complaint in the above-captioned action,
11 it is hereby **ORDERED** that the Stipulation is **GRANTED**, and the time for MGM Resorts
12 International to answer, move, or otherwise respond to Plaintiff's Complaint is hereby
13 extended to and including March 11, 2024.

14
15 IT IS SO ORDERED:

16 

17 _____
18 DANIEL J. ALBRECHTS
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: 2/28/2024